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Attorney for Defendant -DANNY ELLIS

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

* * *

UNITED STATES OF AMERICA,) 2:13-CR-258-JAD (GWF)
)
)
 Plaintiff,)
)
)
 v.)
)
)
)
 DANNY ELLIS,)
)
)
 Defendant.)
)

STIPULATION AND ORDER TO CONTINUE SENTENCING

IT IS HEREBY STIPULATED AND AGREED by and between JESS R. MARCHESE, ESQ. Counsel for Defendant DANNY ELLIS and ROBERT KNIEF, Assistant United States Attorney, that sentencing currently scheduled for January 21, 2015 at 9:00 a.m., and, be vacated and reset to a date and time convenient to the court.

This Stipulation is entered into for the following reasons:

1. Counsel for the defendant has spoken to his client and he has no objection to the request for continuance.
2. Counsel for the defendant has spoken to AUSA Robert Knief and he has no objection to the continuance.

1 3. The defendant has not met with the government yet in order to meet his Safety Valve
2 eligibility requirements.
3
4 4. For all the above-stated reasons, the ends of justice would best be served by a
5 continuance of the sentencing until a date and time convenient to the court.

6 This is the second request for continuance filed for this hearing.

7 DATED: January 16, 2015

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9
10 /S/
11 JESS R. MARCHESE, ESQ.
12 601 S. LAS VEGAS BLVD.
13 LAS VEGAS, NEVADA 89101
14 ATTORNEY FOR THE DEFENDANT
15 MARY MUSSO

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20 /S/
21 ROBERT KNIEF, ESQ.
22 ASSISTANT UNITED STATES ATTORNEY
23 333 LAS VEGAS BOULEVARD SOUTH. #5000
24 LAS VEGAS, NEVADA 89101
25 ATTORNEY FOR UNITED STATES OF
26 AMERICA

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6 Attorney for Defendant – DANNY ELLIS

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

))*)

9 UNITED STATES OF AMERICA,) 2:13-CR-258-JAD (GWF)
10)
11 Plaintiff,)
12)
13 v.)
14)
15 DANNY ELLIS,)
16)
Defendant.)
-----)

17 **FINDINGS OF FACT**

18 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
19 Court finds:

20 This Stipulation is entered into for the following reasons:

21 1. Counsel for the defendant has spoken to his client and he has no objection to the
22 request for continuance.

23 2. Counsel for the defendant has spoken to AUSA Robert Knief and he has no
24 objection to the continuance.

25 3. The defendant has not met with the government yet in order to meet his Safety Valve
26 eligibility requirements.

27 4. For all the above-stated reasons, the ends of justice would best be served by a

1 continuance of the sentencing until a date and time convenient to the court.
2

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4
5 This is the second request for continuance filed for this hearing.
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10 **ORDER**
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12 IT IS HEREBY ORDERED that the sentencing currently scheduled for January 21, 2015,
13 at 9:00 a.m., be continued to Monday, March 16, 2015, at 2:30 p.m. in Courtroom #6D.
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15 DATED this 21st day of January, 2015.
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